

Claudia Center, State Bar No. 158255
Gina Gemello, State Bar No. 282964
The LEGAL AID SOCIETY –
EMPLOYMENT LAW CENTER
180 Montgomery Street, Suite 600
San Francisco, CA 94104
Telephone: (415) 864-8848
Facsimile: (415) 593-0096
Emails: ccenter@las-elc.org
ggemello@las-elc.org

Attorneys for Plaintiffs-Intervenors
ANDREW QUAN, NICHOLAS JONES, and
ELIZABETH HENNESSEY-SEVERSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

THE DEPARTMENT OF FAIR
EMPLOYMENT AND HOUSING,

Plaintiff,

v.

LAW SCHOOL ADMISSION COUNCIL,
INC., *ET AL.*,

Defendants.

JOHN DOE, JANE DOE, PETER ROE,
RAYMOND BANKS, KEVIN COLLINS,
RODNEY DECOMO-SCHMITT, ANDREW
GROSSMAN, ELIZABETH HENNESSEY-
SEVERSON, OTILIA IOAN, ALEX
JOHNSON, NICHOLAS JONES, CAROLINE
LEE, ANDREW QUAN, STEPHEN SEMOS,
GAZELLE TALESHPOUR, KEVIN
VIELBAUM, AUSTIN WHITNEY, and all
other similarly situated individuals,

Real Parties in Interest

Case No. CV 12-1830-EMC

**NOTICE OF MOTION AND
MOTION TO INTERVENE**

DATE: September 7, 2012

TIME: 1:30 p.m.

LOCATION: Courtroom 5, 17th Floor
San Francisco, CA 94102

The Honorable Edward M. Chen

TO EACH PARTY AND ATTORNEY OF RECORD:

NOTICE IS HEREBY GIVEN that on September 7, 2012, at 1:30 p.m., or as soon thereafter as the matter may be heard by the above-entitled court, Real Parties in Interest Andrew Quan, Nicholas Jones, and Elizabeth Hennessey-Severson will and hereby move this Court under Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, Federal Rule of Civil Procedure 24(b), for leave to intervene in the above-referenced action as party plaintiffs.

This motion is brought in order that Mr. Quan, Mr. Jones, and Ms. Hennessey-Severson might assert the claims set forth in their proposed Complaint in Intervention, a copy of which is attached as Exhibit A to the Declaration of Claudia Center in Support of the Motion to Intervene. Further, this motion is brought on the grounds that Mr. Quan, Mr. Jones, and Ms. Hennessey-Severson may intervene as a matter of right pursuant to Federal Rule of Civil Procedure 24(a) or, in the alternative, that Mr. Quan, Mr. Jones, and Ms. Hennessey-Severson have a permissive right to intervene pursuant to Federal Rule of Civil Procedure 24(b).

This motion is based on this Notice, the previously filed Memorandum of Points and Authorities, the accompanying Declaration of Claudia Center with the attached Complaint in Intervention, and the Complaint filed by the Department of Fair Employment and Housing.

Dated: July 27, 2012 Respectfully submitted,

Claudia Center
The LEGAL AID SOCIETY - EMPLOYMENT
LAW CENTER

By: /s/ Claudia Center
Claudia Center

Attorneys for Plaintiffs-Intervenors
ANDREW QUAN, NICHOLAS
JONES, and ELIZABETH
HENNESSEY-SEVERSON